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**PACIFIC BELL**  
A Pacific Telesis Company

July 16, 1993

RECEIVED  
JUL 16 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, Room 222  
Washington, DC 20554

Re: CC Dkt. Nos. 91-141 and 93-162 - Expanded Interconnection  
for Special Access - Virtual Collocation and GSF Adjustments

Dear Mr. Caton:

The Common Carrier Bureau, in its Order in CC Dkt. No. 93-162, released June 9, 1993, applied Section 64.1401(c)(1) of the Commission's Rules to an intrastate service arrangement tariffed by Pacific Bell. The Order instructed Pacific to file tariff revisions no later than July 16, 1993, offering virtual collocation to the same extent that it has tariffed physical collocation.

On July 2, 1993, Pacific filed a Petition for Expedited Waiver of the Virtual Collocation Tariffing Requirement Concerning Intrastate Arrangements. In that filing Pacific requests a limited waiver of Section 64.1401(c)(1) because of the unique nature of the intrastate service arrangement.

Pursuant to Special Permission No. 93-602, Pacific Bell is deferring the filing of virtual collocation, pending resolution of its waiver request.

In addition, the Bureau's June 9 Order, in recognition of the Commission's Report and Order in CC Dkt. No. 92-222, required the local exchange companies to adjust their expanded interconnection rates to reflect misallocation of general support facility (GSF) investment and related expenses. Specifically, LECs must use the method described in Appendix D of the Bureau's Order to calculate and apply rate adjustment factors. Revised rates must be filed no later than July 16, 1993.

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Pacific Bell has performed the calculations required by Appendix D and the resulting ARMIS factor is 1.5926. This factor is greater than the overhead factors calculated by the Bureau for Pacific's expanded interconnection rates. All rate adjustment factors, therefore, are greater than 100%. Consequently, Pacific Bell is not filing revised expanded interconnection rates to reflect changes in GSF allocations.

Acknowledgement and date of receipt of this letter are requested. A duplicate letter is attached for this purpose. Please contact J. A. Goddard on (202) 383-6429 should you have any questions or require additional information on this matter.

CCF A E Swan

Enclosure  
Duplicate Letter

Copy of Letter concurrently delivered to:  
Chief, Tariff Review Branch (Public Reference Copy)  
International Transcription Service, Inc. (ITS)